

## JURY QUESTIONS

### I. Questions about Title VII

#### Question 1

Has Plaintiff Lindsley proved that she would not have been compensated less than one or more of her male predecessors in the position of Director of Food & Beverage at the Omni Hotel in Corpus Christi in the absence of—in other words, but for—her sex?

Answer “Yes” or “No”

Answer: Yes

*On question 1:*

*(1) If you answer yes, then answer question 2.*

*(2) If you answer no, then answer question 5.*

Question 2

What sum of money, if paid now in cash, would fairly and reasonably compensate Plaintiff Lindsley for the damages, if any, you have found Defendant Omni Hotels caused Plaintiff Lindsley?

Answer in dollars and cents for the following items and none other:

1. Past pain and suffering, inconvenience, mental anguish, and loss of enjoyment of life.

\$ 100,000

2. Future pain and suffering, inconvenience, mental anguish, and loss of enjoyment of life.

\$ 0

3. Wages and benefits from September 23, 2013 through December 30, 2014.

\$ 0

4. Wages and benefits from December 31, 2014 through June 8, 2016.

\$ 0

*After answering question 2 (if the instruction to Question 1 requires it), then answer question 3.*

Question 3

Do you find that Plaintiff Lindsley should be awarded punitive damages?

Answer "Yes" or "No"

Answer: Yes

*After answering question 3 (if the above instructions require it), then:*

*(1) If you answer yes, then answer question 4.*

*(2) If you answer no, then answer question 5.*

Question 4

What sum of money should be assessed against Defendant Omni Hotels as punitive damages?

Answer in dollars and cents:

\$ 25,000,000

*On question 4: after answering question 4 (if the above instructions require it), then answer question 5.*

## II. Equal Pay Act Questions

*Answer question 5 no matter what your answers were to questions 1-4.*

### Question 5

Has Plaintiff Lindsley proved that Defendant Omni Hotels paid her less than members of the opposite sex for performing work in a position requiring equal skill, effort, and responsibility under similar working conditions?

Answer "Yes" or "No"

Answer: Yes

*On question 5:*

*(1) if you answer yes, then answer question 6.*

*(2) If you answer no, then answer question 10.*

Question 6

Has Defendant Omni Hotels proved that the difference in pay was the result of a factor other than sex?

Answer "Yes" or "No"

Answer: Yes

*On question 6:*

- (1) If you answer yes, then answer question 10.*
- (2) If you answer no, then answer question 7.*

Question 7

Was Defendant Omni Hotels's violation of the Equal Pay Act willful?

Answer "Yes" or "No"

Answer: N/A

*On question 7:*

*(1) If you answer yes, then answer question 8.*

*(2) If you answer no, then answer 9.*

Question 8

What sum of money, if paid now in cash, is the difference in pay between Plaintiff Lindsley and her male comparators (Jason Polland, Robert Walker, and Daniel Cornelius) from October 25, 2014 to June 8, 2016?

Answer in dollars and cents:

\$ N/A

*After answering question 8 (if the above instructions require it), then answer question 10.*



Question 9

What sum of money, if paid now in cash, is the difference in pay between Plaintiff Lindsley and her male comparators (Jason Polland, Robert Walker, and Daniel Cornelius) from October 25, 2015 to June 8, 2016?

Answer in dollars and cents:

\$ N/A

*After answering question 9 (if the above instructions require it), then answer question 10.*


### III. Integrated Enterprise Question

#### Question 10

Has Plaintiff Lindsley proved that Omni Hotels Management Corporation and TRT Holdings, Inc. represent a single, integrated enterprise?

Answer "Yes" or "No"

Answer: Yes

  
Foreperson

3/9/2023  
Date